

1 though, is August 2nd, but it's at 23:07, which would be
2 11:07 in the evening, correct, sir?

3 A Yes.

4 Q Is it your understanding, or was it your
5 understanding, that when the nurses prepared their triage
6 notes that they do it in real time? In other words, do
7 they do it on the computer, or do they do it in
8 handwriting somewhere and transfer the handwriting into a
9 typed up progress note, or what's the process?

10 MR. O'HALLORAN: Object to the form.
11 Foundation. You can answer, if you know.

12 A There is enough of a note to see the vital signs, but
13 oftentimes the note is not complete.

14 Q (By Mr. Howard) Typically when -- or, strike that.

15 Do you know if Ms. Whitley, back on August
16 2nd of 2014, prepared handwritten notes?

17 A I do not know.

18 Q Did you see any handwritten notes on that occasion
19 relating to Mr. Wright?

20 A My memory says I did not see any written notes.

21 Q Ultimately did you review and approve her triage
22 note, sir?

23 A The question, please?

24 Q Yes. Did you read -- strike that. Back on August
25 2nd of 2014, did you read and approve nurse Whitley's

1 triage note?

2 MR. O'HALLORAN: Object to the form. It's
3 compound.

4 A I do not specifically recall reading the note, but my
5 normal practice would be if it's available I would have
6 read the note.

7 Q (By Mr. Howard) Right. Do you understand what these
8 times mean? In other words, the date of note says 20:50.
9 Do you understand what the significance of that time is,
10 20:50?

11 A Well, my understanding is that is the time that the
12 note was started. The nurses started typing the note at
13 that time.

14 Q And do you understand what it means "Entry date" and
15 then gives us a time of 23:07? Do you understand what
16 that represents?

17 A Well, that would normally mean when the note is
18 entered into the permanent record.

19 Q Okay. Let me take you to page three of Exhibit 1.

20 A (Complied).

21 Q There's an addendum at the bottom of page three
22 indicating that "The veteran," Mr. Wright, "was taken to
23 bed 118 via wheelchair." Do you see that, sir?

24 A Yes, sir.

25 Q Bed 118 was in the emergency room?

1 A No, I don't recall how he arrived exactly to the ER.

2 Q Is it your best recollection that despite some pain
3 in that left leg he was able to pedal push, move against
4 gravity, all of that, within normal limits as far as the
5 left leg was concerned?

6 A Yes, sir. He had normal use of that extremity other
7 than the injury.

8 Q Very good. Going to page six of Exhibit 1, now we're
9 getting to the discharge note, and I'm going in the order
10 in which these are in the exhibit. I realize it's not
11 necessarily the order of things that happened that night.
12 But we're looking at your discharge note, are we not,
13 sir?

14 A Yes.

15 Q And go to the date of the note again. It says 20:50,
16 and then the entry date it also says 20:50. So the date
17 is August 2nd but the times are both 20:50?

18 A Uh-huh.

19 Q Can you explain to me what those times mean in
20 context of this discharge note?

21 A It appears I finished the whole note in a short time
22 period as he was being discharged.

23 Q It looks like about 20 seconds, if I'm reading this
24 right? I mean, if the date of note is -- if the date of
25 the note is --

1 If you're beginning to write the note and the
2 entry date at that time is when the note is completed,
3 there's not a lot of time. And I'm assuming that you
4 didn't write this note in 20 seconds?

5 A No, I did not. As I look at my electronic signature,
6 it was actually two minutes later. 20:52. So --

7 Q So is it your recollection that you were able to
8 write this note -- and I don't care if it was two minutes
9 or four minutes or 10 minutes, but is it your
10 understanding that you wrote the discharge note at about
11 8:50 on August 2nd of -- strike that.

12 Yeah, at 8:50 the evening of August 2nd?

13 A Yes, sir.

14 Q Okay. Under the instructions it talks about first
15 the diagnosis. Diagnosis is head injury, correct, sir?

16 A That is correct.

17 Q "Without concussion" it says, correct?

18 A Correct.

19 Q How did you determine that there was no concussion?

20 A I examined Mr. Wright thoroughly and appropriately
21 for the situation, including asking him specific
22 questions about how he felt about his memory of the fall
23 and any symptoms or anything at all that might relate to
24 a head injury, and he simply had no symptoms or signs of
25 a concussion.